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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X)	
)	
In re:)	
)	Chapter 11
DELPHI CORPORATION, et al.,)	Case No. 05-44481 (RDD)
)	Jointly Administered
Debtors.)	
-----X		

**OBJECTION OF PBR COLUMBIA LLC TO
CURE AMOUNT WITH RESPECT TO EXECUTORY CONTRACT TO BE ASSUMED
OR ASSUMED AND ASSIGNED UNDER PLAN OF REORGANIZATION**

PBR Columbia LLC (“PBR Columbia”)¹, by its attorneys Foley & Lardner LLP, hereby submits this Objection (the “Objection”) to the Cure Amount With Respect to Executory Contract to be Assumed or Assumed and Assigned Under Plan of Reorganization (the “Cure Notices”). In support of its Objection, PBR Columbia respectfully represents as follows:

BACKGROUND

1. On October 8 and 14, 2005 (the “Petition Dates”), Delphi Corporation (“Delphi”) and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned case (collectively, the “Debtors”), filed voluntary petitions in this Court for

¹ PBR Columbia notes that it received two Cure Notices at the address 201 Metropolitan Dr., West Columbia SC 29170. One Cure Notice was addressed to “PBR Columbia LLC PBR Automotive South Carolina” and the other Cure Notice was addressed to “Pacific Group LTD.” All Purchase Orders identified in the Cure Notices however, are between the Debtors and PBR Columbia, and therefore, PBR Columbia is the entity filing this Objection and the counter-party to the Purchase Orders.

reorganization relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1330, as then amended (the “Bankruptcy Code”).

2. On December 10, 2007, the Debtors filed the First Amended Joint Plan of Reorganization (the “Plan”). On January 25, 2008, the Court entered an order confirming the Plan (the “Confirmation Order”).

3. On January 29, 2008, the Debtors filed the Cure Notices with the Court. According to the Cure Notices, parties have 10 days to respond, or February 8, 2008. Accordingly, this Objection is timely filed.

4. Prior to the Petition Dates, Delphi issued and PBR Columbia accepted various purchase orders that form the contractual obligations of the parties (collectively, the “Purchase Orders”).

5. The Cure Notices identified the following eleven (11) purchase orders proposed to be assumed and assigned as part of the Plan with the following proposed cure amounts:

Purchase Order to be assumed and/or assigned	Cure Amount
D0550069751	\$0.00
D0550023910	\$0.00
D0550037760	\$0.00
D0550056755	\$0.00
D0550038469	\$0.00
D0550075273	\$0.00
D0550069109	\$0.00
D0550075154	\$0.00
D0550069113	\$0.00

D0550009978	\$0.00
D0550004296	\$0.00

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6. PBR Columbia submits that with respect to Purchase Order D0550069751, the correct cure amount is \$161,494.92. Documents supporting this corrected cure amount: (a) are in the possession of the Debtors, and (b) contain confidential information that if disclosed as part of this Objection would damage PBR Columbia and the Debtors. Therefore, such materials will be provided to the Debtors as the parties attempt to resolve their differences concerning the cure amounts.

7. In addition, as set forth in the proofs of claim filed by PBR Columbia against Delphi Corporation and Delphi Automotive Systems LLC (See **Exhibit A** attached hereto), PBR Columbia has the following setoff claims against the Debtors which must be paid as part of the proposed cure amounts:

Purchase Order	Setoff Amount
D0550056755	\$393.12
D0550038469	\$17,764.92
D0550069113	\$15,733.44
D0550004296	\$83.52

8. Finally, PBR Columbia hereby requests that all cure amounts be paid in Cash (as defined in the Plan) pursuant to Article 8.2(a) of the Plan.

CONCLUSION

WHEREFORE, PBR Columbia respectfully requests that the Court enter an order (a) denying assumption in the manner proposed in the Cure Notices, and (b) scheduling a hearing on the matter.

Respectfully submitted,

FOLEY & LARDNER LLP

/s/ David G. Dragich

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February 8, 2008

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing Objection of PBR Columbia LLC to the Cure Amount With Respect to Executory Contract to be Assumed or Assumed and Assigned Under Plan of Reorganization has been served upon the following parties by hand delivery this 8th day of February, 2008:

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Attn: Deputy General Counsel, Transactions
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